

4. On March 1, 2017, the Court granted summary judgment in this matter in favor of Plaintiff Sergey Leontiev and issued a declaration that “Sergey Leontiev owes no debt or obligation to defendant Alexander Varshavsky.” Accordingly, Plaintiff is the prevailing party

and is entitled to recover costs pursuant to Fed. R. Civ. P. 54(d) and Local Rule 54.1. A true and correct copy of the Final Judgment (Dkt. No. 70) is attached hereto as Exhibit A.

5. Plaintiff incurred taxable costs in this matter of \$32,789.28, as set forth in Sergey Leontiev's March 13, 2017 Bill of Costs, attached hereto as Exhibit B. These costs are correctly stated, are allowable by law, and were necessarily incurred as stated herein. These costs consist of the following components.

6. Plaintiff incurred a cost of \$400.00 for the court filing fee incurred to initiate the above-captioned action. A true and correct copy of the email confirming this payment is attached hereto as Exhibit C.

7. Plaintiff incurred costs of \$23,699.28 for deposition transcripts for the following witnesses: Kamo Avagumyan, Karen Avagumyan, Vadim Kolotnikov, Charles Laurence, Sergey Leontiev, Irina Monakhova, Andrei Pavlovich, Vitaliy Popov, Yulia Semenova, Alexander Shcheglyaev, Alexander Varshavsky, Vadim Voronin, Alexander Zheleznyak, and Irina Zubiy. These costs are recoverable under 28 U.S.C. § 1920 and Local Rule 54.1. True and correct copies of the invoices for these deposition transcripts are attached hereto as Exhibit D.<sup>1</sup>

8. Plaintiff incurred costs of \$8,690.00 for interpretation services at depositions for the following witnesses: Kamo Avagumyan, Karen Avagumyan, Irina Monakhova, Andrei Pavlovich, Vitaliy Popov, and Yulia Semenova. *See* 28 U.S.C. § 1920(6) (allowing recovery of "compensation of interpreters"); Local Civ. R. 54.1(c)(4) (same). True and correct copies of the invoices for these interpretation services are attached hereto as Exhibit E.

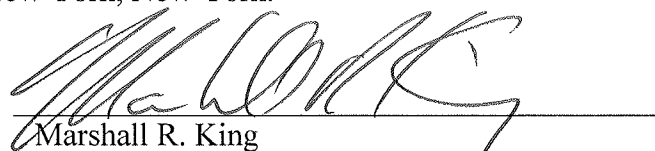
9. WHEREFORE, Plaintiff respectfully requests the Clerk issue an order granting Plaintiff costs in the amount of \$32,789.28.

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<sup>1</sup> The "Realtime Services" expenses reflected in the invoices included in Exhibit D are excluded from Plaintiff's request for costs.

Executed on this 13th day of March 2017 at New York, New York.

By:

A handwritten signature in black ink, appearing to read 'M. King', is written over a horizontal line.

Marshall R. King

GIBSON, DUNN & CRUTCHER LLP

200 Park Avenue

New York, NY 10166-0193

Telephone: 212.351.4000

Facsimile: 212.351.4035

*Attorney for Plaintiff Sergey Leontiev*